

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO

UNITED STATES OF AMERICA	§	
	§	
V.	§	No. 1:19-CR-000482-01
	§	
ROBIN LONGORIA	§	

UNOPPOSED SECOND MOTION FOR CONTINUANCE

To the Hon. Christopher A. Boyko:

Robin Longoria, defendant, by and through counsel, moves the Court to continue the scheduling sentencing hearing until June 9, 2020 because of the demands of counsel's caseload.

This matter is currently set for sentencing on Tuesday, March 10, 2020.

However, counsel's caseload includes preparation for two trials and other significant matters that will interfere with his preparation for Ms. Longoria's sentencing hearing. Specifically:

1. Counsel is set for trial on March 2, 2020, in the Criminal District Court Number One of Tarrant County, Texas, in cause number 1573491 styled *The State of Texas v. Pathom Daniels*. This case involves an allegation of Murder. The State's witness list includes multiple eye-witnesses. Because

of the extent of potential evidence at trial, counsel expects that the trial in this matter will not be concluded before the current sentencing setting.

2. Counsel is also set for trial on March 6, 2020, in the 396th District Court of Tarrant County, Texas, in cause number 1621052 styled *The State of Texas v. Donald Daniels*. This case involves an allegation of Engaging in Organized Crime. The State's witness list includes 95 persons. Because of the extent of potential evidence at trial, counsel expects that the trial in this matter will not be concluded before the current sentencing setting.
3. Counsel has a deadline for the preparation of an Appellant's Brief due on February 26, 2020, for the Second Court of Appeals, in cause number 02-19-00247-CR styled *State of Texas v. Joshua Babin*.

Counsel is mindful that these obligations pertain to state matters and that this Court's business takes precedence. Unfortunately, these state matters have been pending for more than a year. Counsel is hopeful that a continuance until June 9, 2020, would not detrimentally affect the Court.

Conclusion

Counsel for the reasons stated above, requests a continuance until June 9, 2020.

Respectfully submitted,

//Steve Jumes//

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CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that he discussed the above and foregoing submission on February 13, 2020, with Assistant United States Jason Manning Rice who indicated that she is not opposed to this motion.

//Steve Jumes//

Steve Jumes

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing submission was served on all counsel as well as Assistant United States Attorney Chelsea Rice via ECF filing on February 26, 2020.

//s// Steven Jumes

Steven Jumes